

Honorable Julius Genachowski, Chairman
Commissioner Michael J. Copps
Commissioner Robert M. McDowell
Commissioner Mignon Clyburn
Commissioner Meredith Attwell Baker
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: CG Docket Nos. 03-123 and 10-51

Dear Chairman Genachowski and Commissioners Copps, McDowell, Clyburn, and Baker,

As a person who had Deaf parents and relatives, I have seen a lot of technological advances for Deaf people. First, it was the old Western Union teletype machines (TTY), then the decoder from Sears for closed captioning on TV, then the MCM, (a smaller version of the TTY), C Phone, etc. Then all TVs now have built in captioning. Now, we have the video phone. We have come a long way in improving the lives of Deaf and hearing people. Deaf people no longer have to ask a neighbor, their child/children, friend, etc. to make phone calls for them. Can you imagine calling your girlfriend/boyfriend and talking about plans for the prom through your parents or a neighbor?

I started working for Sorenson Communications in 2005 and when I first went there ? I thought this is just a fad. But, after seeing the equipment ? VP 100 ? I wished that my parents and relatives were alive to experience this. As a child, I remember watching the Jetsons on TV and wishing that there was a phone like Jane used to call her husband George. When I first started working at Sorenson, I was like ? we are all like the Jetsons.

I learned of the history of Sorenson and how they invented and developed the video phone. I was thrilled that I was able to work at a place that had the same love for the Deaf community as I do. They are the first and largest VRS provider in the US. Sorenson has provided free video phones to Deaf consumers whereas the other VRS companies charge for their video phones. Sorenson hires and continues to provide training to their pool of interpreters so that the interpreters are on top of their game. Sorenson also is one of, if not, the largest employer of Deaf people.

As an employee of a Video Relay Service (VRS) provider, I have the privilege of assisting Deaf individuals to communicate by videophone in American Sign Language, pigeon sign language, signed English, lip reading, etc. using VRS. I have seen first-hand that this life-altering broadband service is a vital link that connects Deaf people to the hearing community. Imagine, not having to drive over to the Blockbuster to see if they have a DVD that you would like to watch and then they don't have it ?

think of the gas you just burned to get to the Blockbuster. Think of the global impact that the video phone has had on people. In my day, we all piled into the car and drove across town just to see if a person was home. Now, Deaf people can call.

Ensuring that deaf individuals have access to VRS and encouraging improvements in VRS should be a high priority for you as Chairman and Commissioners of the Federal Communications Commission (FCC). The Americans with Disabilities Act (ADA) requires the FCC to make available to all deaf individuals nationwide ?functionally-equivalent? communications.

You will soon determine the future of VRS. When you set the VRS rate, you will determine whether America makes progress toward the statutory goals of functional equivalence, nationwide access and inclusion ? or force deaf users to revert to TTY communications which would be a step in the wrong direction. And, you will determine whether VRS fulfills its potential to drive broadband adoption by the deaf, even in the face of poverty and isolation.

I was deeply disturbed to see the Commission?s recent Public Notice on VRS rates. These proposals would put an end to VRS as we know it. My employer has already informed me that if these proposed rates are adopted, our company would head into bankruptcy. This would be disastrous for deaf VRS users as well as to the employees, both deaf and hearing.

The FCC should be increasing the availability and use of VRS, not cutting back. You should adopt a rate that encourages continuing improvements in VRS technology and continues to improve services levels. Recent developments in VRS are a good example of how the service can be improved, such as enhanced 911 services, 10-digit numbering, a larger and better-trained pool of interpreters and better videophones with an array of enhanced features. Monthly payments for broadband are a big expense for many deaf people, and instead of trying to cut back on VRS, you should be exploring ways to make VRS over broadband more affordable to deaf individuals.

Progress towards functional equivalence will be destroyed if the FCC does not encourage VRS providers to improve VRS and make it more widely available. VRS is a recent and dramatic advancement that benefits both those who are deaf and their families, doctors, lawyers, etc., but so much more can be done. It would be tragic if the FCC were to destroy this broadband service that is so vital to the deaf.

Recent reports of fraud in the VRS industry are disturbing to employees who work for a company that has operated within current FCC guidelines and has worked diligently to maintain the integrity of the VRS fund. The FCC must devote more of its time and energy to focusing on the elimination of fraud.

I urge you to establish a fair and predictable rate for VRS that will encourage VRS providers to invest

in improving VRS and reaching more deaf individuals. The law requires it and it is the right thing to do.

Also, I believe all VRS providers deserve to have a 3 to 5 year rate schedule instead of the proposed 1 year rate schedule. It is hard for any company to be efficient and competitive and to be able to project their growth and financial plan for 2 or 3 years when they cannot plan beyond 1 year. If it is time that the Commission needs to work on a better rate schedule then I propose that the Commssion extend the existing rate for another 2 years to allow for time needed to develop a better plan. The VRS industry must go on.

Sincerely,

Jo Ann Miller-Kinsey